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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. CR 19-00643 JST
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME FROM
)	DECEMBER 20, 2019 TO JANUARY 24, 2020
v.)	AND [PROPOSED] ORDER
)	
ROSS ANTHONY FARCA,)	
)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant, Ross Anthony Farca, that time be excluded under the Speedy Trial Act from December 20, 2019 through January 24, 2020.

At the status conference held on December 20, 2019, the government and counsel for the defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including reviewing the discovery in the case. At the hearing, the government provided defense counsel with discovery, and advised the court that it will provide additional discovery in the coming weeks, which defense counsel will need time to review. For this reason and as further stated on the record at the status conference, the parties stipulate and agree that excluding time until January 24, 2020, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

The parties further stipulate and agree that the ends of justice served by excluding the time from December 20, 2019 through January 24, 2020, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that she has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: December 23, 2019

/s/
KIMBERLY HOPKINS
Assistant United States Attorney

DATED: December 23, 2019

/s/
JOYCE LEAVITT
Counsel for Defendant Ross Farca

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on December 20, 2019, and for good cause shown, the Court finds that failing to exclude the time from December 20, 2019 through January 24, 2020, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from December 20, 2019 to January 24, 2020, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from December 20, 2019 through January 24, 2020, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: _____

HON. JON S. TIGAR
United States District Judge